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# SHELBY COUNTY 9-1-1 DISTRICT

785 Crossover Lane • Suite 150  
Memphis, Tennessee 38117

PHONE (901) 685-0911

FAX (901) 763-0929

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November 23, 1993

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Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N. W. Room 222  
Washington, DC 20554

Dear Ms. Searcy:

Enclosed please find an original and nine copies of our comments on  
CC Docket No. 92-105. Please forward a copy to each commissioner.

Respectfully submitted,



John Garner  
Director

JG/pae

Enclosures

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# SHELBY COUNTY 9-1-1 DISTRICT

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
The Use of N11 Codes and Other )  
Abbreviated Dialing Arrangements )

CC Docket No. 92-105

Comments of  
The Shelby County, Tennessee  
Emergency Communications District

The Shelby County, Tennessee Emergency Communica-  
tions District ("The District") hereby submits its comments on  
the Notice of Proposed Rulemaking in CC Docket No. 92-105

On March 6, 1992, BellSouth Telecommunications Inc.  
("BellSouth") filed a petition which asks the Commission to  
find that the limited number of available N11 codes could,  
consistent with the Communications Act and Commission  
policies, be assigned to specific customers for their  
individual use in providing local pay-per-call type informa-  
tion services.

The District at its meeting on October 21, 1993 went on record  
as opposing any allocation of N11 abbreviated dialing codes  
for **commercial** use. N11 codes should be reserved or allocated  
only for non-commercial purposes which serve the public  
interest. The District offers the following in support of its  
position.

Historically three digit numbers have been restricted for use  
by the nation's telephone companies to provide broad public  
services such as directory assistance (411) and access to  
public safety answering agencies (9-1-1). Expansion of three  
digit numbers, particularly through use of N11, for commercial  
purposes makes a dramatic and serious departure from its  
traditional use.

The emergency number districts have already experienced a  
major problem educating the public concerning the appropriate  
use of 9-1-1 service. The dispatch center staff and the  
emergency lines are burdened with the public calling 9-1-1 in  
non-emergency situations. Adding similar N11 numbers for  
commercial uses will greatly increase the difficulty of

adequately educating the public on the proper use of 9-1-1 and will further tie up lines which should be dedicated to emergency use.

The District presently experiences a significant number of mis-dials by parties attempting to reach directory assistance by dialing 9-1-1 instead of 411. The District has also determined that many individuals but both 9-1-1 and 411 on their speed dial of their phones and hit the wrong button resulting in additional mis-dials. In point of fact, the District performed a survey of calls for a twenty-four hour period on October 23, 1993. During that time span the District received 1,047 calls at one of its dispatch centers. Of these calls, 330 calls (31.52%) were non-emergency calls intentionally dialed to 9-1-1 and 166 (15.85%) were unintentional mis-dials.

Another serious public concern generated by mis-dials of 9-1-1 is the impact that it would have on the provision of emergency services. Under circumstances in which an individual calls 9-1-1 and hangs up (the most often reaction to a mis-dial), the police department dispatchers who receive such calls are instructed to call back the incoming call number to verify that there is not an emergency. If the incoming call number does not answer or is busy, the dispatcher alerts a police officer to make the scene of that address. With additional numerous mis-dials, the result could place an even greater strain on existing police resources. This again could result in risk of loss of life and property under circumstances in which the police department would not be able to cover true emergency situations while responding to non-emergency circumstances.

We are also concerned about the individual who accidentally dials N11 when he or she intends to dial 9-1-1 in a true emergency situation. In an emergency the individual will already be under great stress and will be even more confused when he or she reaches an automated menu system or recorded message. This may result in life threatening delays in receiving emergency assistance.

The Commercial Appeal, the newspaper with the largest circulation in Shelby County and the most likely successful applicant for N11 service in the area in which the District operates, has submitted comments to the Tennessee Public Service Commission on this issue. In those comments, The Commercial Appeal states that as a voice information service on "CA InfoLine" which receives an average of 9,600 per day. Based upon that average, The Commercial Appeal anticipates that the CA InfoLine will receive approximately 300,000 calls per month or over 3,000,500 calls per year. Presuming that there is an allocation of all or remaining N11 numbers available in that all commercial users attract the same number of calls anticipated by The Commercial Appeal, the commercial N11 services generate 1.2 million calls each month. Even if only 1% of

these callers mis-dial 9-1-1 each month, this would total 12,000 miscalls to the District every month. This situation would present a tremendous burden upon the resources of the District, would require additional allocation of phone lines and manpower, and could seriously jeopardize the personal safety and property of the citizens of Shelby County.

The District is also concerned that the allocation of N11 numbers for commercial use on a pay-for-call basis may inhibit the public from using the N11 emergency number because of concern over expense. The public has become accustomed to using N11 services (411 and 9-1-1) as free services available for public service. The use of N11 numbers for commercial, pay-for-call basis with the accompanying advertising and publicity associated therewith, may confuse the public into believing that all N11 services have costs associated therewith. Under such circumstances, the poor and undereducated citizens may be inclined to revert to old calling patterns such as dialing the operator under emergency circumstances because they believe such services to be free and that calling 9-1-1 may involve costs. This would result in substantial delay in the deployment of emergency services and would create strain on the existing operator services.

Traditionally the allocation of N11 numbers has been restricted to non-commercial free public services. The District encourages the continuation of this policy.

The District recognizes that there may be additional, non-commercial uses of N11 services. Examples of this include the use of N11 services for state and local governments,, use by local exchange carriers for repair services and other similar uses. While any additional use of N11 services could result in some adverse implications for emergency 9-1-1 providers, allocation to these types of non-commercial users should have minimal adverse impact. Certainly such providers would not project the type of heavy usage contemplated by commercial applicants.

The North American Numbering Plan and Bellcore have scheduled to completely revamp the present numbering system by January, 1995. Even if the proposed allocation can be accomplished within the next couple of months, the general perception seems to be that other abbreviated dialing such as \*xx or xx# will be available by January, 1995. It seems inappropriate for the Commission to permit the confusion and adverse implications which will be generated by the commercial service for a "benefit" which will be temporary in nature.

The Tennessee Emergency Number Association ("TENA"), the National Emergency Number Association ("NENA") and the Tennessee Chapter of the Associated Public-Safety Communications Officials ("Tennessee APCO") are also concerned about the potential adverse impact that the allocation of N11 codes

service to commercial interest would have on emergency 9-1-1 service. All of these organizations have taken a strong position against the allocation of N11 service to commercial interest both on a local and a national level. In point of fact, indeed on June 26, 1993 at the national NENA conference, the NENA executive board went on record as opposing N11 service codes for commercial purposes and the Executive Committee of The Tennessee Chapter of APCO, by conference call, on October 27, 1993 went on record as opposing the allocation of N11 codes for commercial purposes. The Board of Officers of TENA by conference call on October 27, 1993 have voted to oppose such allocation, and the Board of Directors of the District voted to oppose such allocation at its regular meeting on October 21, 1993.

Respectfully submitted,



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**JOHN GARNER**  
Director